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Sent Via Electronic Mail

Honorable Andrew L. Carter, Jr.  
United States District Judge  
U.S. District Court for the Southern District of New York  
40 Foley Square, Room 435  
New York, NY 10007

Re: Zelouf International Corp. v. Na El, Inc., et al., No. 13 CV 1788 (ALC)  
(JCF)

Dear Judge Carter:

This firm represents Na El, Inc. (“Na El”) in the above-referenced action. We are writing jointly with Michael Goldberg of Pryor Cashman LLP, counsel for Zelouf International Corp. (“Zelouf”) in compliance with the Court’s order of August 15, 2014 requiring a report on the “damask” claim in this copyright action. (For clarification, this case currently involves two claims: the damask claim and a claim involving a plaid design. A meet-and-confer report on the plaid design is due on October 14, 2014).

Mr. Goldberg and I have met and conferred several times in the past weeks concerning both the damask and plaid designs. Zelouf has also served additional discovery regarding both designs on Na El, and Na El's responses are due later this month. Counsel are now discussing which motions they wish to file and what additional discovery will be required in order to file and oppose such dispositive motions. Counsel have discussed how to resolve these issues in order to reach an efficient briefing schedule, and believe that they will have a definitive proposal for the Court concerning both designs by the date that the meet-and-confer report on the plaid design is due. Accordingly, the parties jointly request that the Court extend the date for the joint report on the damask claim, and will submit one joint report addressing both designs by October 14, 2014.

Thank you for your consideration of this request.

Sincerely yours,

  
Michael D. Steger

cc: Michael Goldberg, Esq.  
Stephanie Kline, Esq.  
Scott A. Burroughs, Esq.